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January 19, 2022

SENT VIA ECF

Hon. John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: United States v. Aviram Azari
1:19 Cr. 00610 (JGK)**

Dear Judge Koeltl:

On behalf of my client Aviram Azari, and with the government's consent, we would most respectfully request that the conference scheduled for Monday, January 25, 2022 be adjourned 6-weeks, to a date convenient to the court.

I make this request because within the past 30-days we have been engaged in fruitful and productive plea negotiations, but the recent COVID Omicron Variant has essentially stopped us in our tracks. Specifically, my consultant and Israeli translator and his family all got Covid in late December. As well, due to intermittent quarantining throughout the MDC, It has been impossible to even get Mr. Azari on an attorney call. Since the time I needed to have spent with my client and the translator are necessary to progress with the plea negotiations, we will require one final adjournment for that purpose.

Accordingly, based on the forgoing, we would respectfully request that the Court grant this application. In the event that we reach an agreement, with the Court's permission, we would inform Mr. Fletcher and so advise so a plea can be scheduled.

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On behalf of Mr. Azari, we waive speedy trial time based on the reasons contained within this request and in the interests of justice.

The Court's consideration is greatly appreciated.

Respectfully,

A handwritten signature in black ink, appearing to read 'Barry S. Zone', with a long horizontal flourish extending to the right.

Barry S. Zone

cc: AUSA Olga Zverovich
AUSA Juliana Murry